ITEMS of NON-COMPLIANCE

IOP 8.0

Revision 03
ITEMS OF NON-COMPLIANCE

1. OBJECTIVE

The objective of this procedure is to provide guidance for the Radiation Safety Officer and individuals whom issue items of non-compliance and seek their resolution.

2. INSTRUCTIONS

2.1 Items of Non-Compliance

a. Level 1 Deficiency Lab:

A Level 1 deficiency laboratory is a laboratory which has been issued a survey report with a minor item of non-compliance such as those listed on the Radiation Safety Survey Report, ie.

i. Contamination > 100 dpm ≤ 1000 dpm (above background)
ii. Dose rates > 2 mR/hr, unshielded
iii. Evidence of eating, drinking, smoking or application of cosmetics
iv. Lab coat, gloves, or dosimeter not worn
v. Missing inventory use entry
vi. Missing signs, labels or postings
vii. Missing wipe test results or results not in dpm
viii. Stock vials unsecure
ix. Not taking Radiation Worker Refresher on time

A level one laboratory will be issued a survey report with an item of non-compliance sent to the Authorized User, and the Radiation Safety Committee will be notified. The survey report should be returned to the RSO within 30 days with corrective actions.

b. Level 2 Deficiency Lab:

A level 2 deficiency lab would be issued a survey report with a moderately serious item of non-compliance such as,

i. A worker using radiation without the completion of Radiation Worker Training
Ordering, Receiving and Delivering Radioactive Material

ii. The Transfer of radioactive material to another laboratory without the approval of the RSO

iii. Contamination > 1,000 dpm < 2000 dpm (above background)

iv. Dose levels greater than 5 mR/hr, unshielded

v. Not resolving a level one deficiency

A level 2 deficiency will be issued a survey report with an item of non-compliance with a copy sent to the Authorized User, the department head, the Radiation Safety Committee Chair and the Radiation Safety Committee will be notified. The survey report should be returned with corrective actions within 30 days. Two repeat level 1 items of non-compliance in one year will be treated as a level 2 deficiency laboratory.

c. Level 3 Deficiency Lab:

A level 3 deficiency lab is defined as a laboratory with the most serious item of non-compliance such as

i. Loss of radioactive material

ii. Unauthorized release of radioactive material to the environment or the regular trash

iii. Ordering radioactivity without EHS approval or without a current permit

iv. Contamination > 2,000 dpm (above background)

v. Dose levels greater than 10 mR/hr, unshielded

vi. Use of radioactivity for malicious intent

vii. Not resolving a level 2 deficiency

A level 3 deficiency laboratory will be issued a survey report with an item of non-compliance to the Authorized User, and a copy sent the department head, and the Radiation Safety Committee Chair. The permit will be suspended and the Authorized User will be required to meet with the Radiation Safety Committee to ask for the reinstatement of his/her permit. Three level 1 or two level 2 items of non-compliance in one year will be treated as a level 3 deficiency laboratory. A level 2 and a level 1 item of non-compliance in one year will also be treated as a level 3 deficiency laboratory.
3. FORMS AND ATTACHMENTS

3.1 None.

4. SUMMARY OF CHANGES

4.1 Revision 01: Effective date June 16, 2010- Initial Issuance.

4.2 Revision 02: See 2.1, a, ix, and 2.1, c, effective Oct 5, 2015

4.3 Revision 03: See 2.1 a. vii, 2.1 b v., and 2.1 c vii, effective Oct. 21, 2016.

Approved By: ____________________________________  _____________
Radiation Safety Officer  Date